

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RATIO CHRISTI AT THE UNIVERSITY
OF NEBRASKA-LINCOLN, et al.,

Plaintiffs,
v.

TIMOTHY CLARE, et al.

Defendants.

Case No. 4:21-cv-3301

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER**

COME NOW all named Defendants and move the Court for an extension of their deadline to answer Plaintiffs' First Amended Complaint to October 21, 2022. In support of this motion, Defendants state as follows:

1. Plaintiffs have sought leave, and leave has been granted, to file an Amended Complaint in this matter, without opposition from Defendants. Plaintiff filed and served the Amended Complaint on August 25, 2022.
2. Pursuant to Federal Rule of Civil Procedure 15(a)(3), Defendants have 14 days from the date of the filing and service of the Amended Complaint, until September 8, 2022, to answer Plaintiffs' Amended Complaint.
3. Defendants seek an extension of the answer date due to the voluminous nature of the Amended Complaint—336 paragraphs and 47 pages of allegations, and 125 pages of exhibits—and to the undersigned's schedule and the need for time to adequately investigate and prepare Defendants' response, particularly in light of the Court's Order granting in part and denying in part Defendants' Motion to Dismiss Plaintiff's original Complaint.
4. Prior to the filing of the First Amended Complaint, Defendants agreed not to oppose the requested extension to October 21, 2022.

WHEREFORE, Defendants respectfully request an order extending their time to answer Plaintiffs' Complaint to October 21, 2022.

Dated August 26, 2022.

TIMOTHY CLARE, JACK STARK, JIM PILLEN, ELIZABETH O'CONNOR, ROBERT SCHAFER, PAUL KENNEY, BOB PHARES, BARBARA WEITZ, TED CARTER JR., RONNIE GREEN, LAURIE BELLOWS, VERONICA RIEPE, KAREN FREIMUND WILLS, UNIVERSITY PROGRAM COUNSEL, JACOB DRAKE in his official capacity, and KIRSTEN WANDREY in her official capacity, Defendants

By: s/ Andre R. Barry
Andre R. Barry, #22505
Nathan D. Clark, #25857
CLINE WILLIAMS WRIGHT
JOHNSON & OLDFATHER, L.L.P.
233 South 13th Street
1900 U.S. Bank Building
Lincoln, Nebraska 68508
(402) 474-6900
abarry@clinewilliams.com
nclark@clinewilliams.com

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was filed with the clerk using the Court's CM/ECF system, which will send notice of the same to all counsel of record.

s/ Andre R. Barry
Andre R. Barry, # 22505